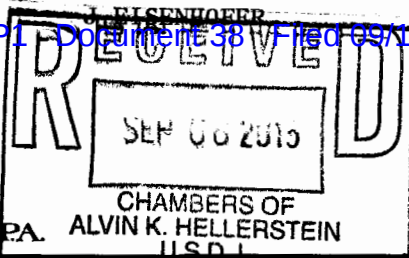




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September 4, 2015

By Fax

Hon. Alvin K. Hellerstein
Hon. John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: In re Application of Dr. Heleen Mees, No. 15 Misc. 262

Dear Judges Hellerstein and Koeltl:

We represent Dr. Heleen Mees in the above-captioned miscellaneous matter, which involves a 28 U.S.C. § 1782 application for discovery from Citigroup Inc. ("Citi"). In our application papers, we marked this matter as related to *In re Application of Dr. Heleen Mees*, No. 14 Misc. 56 (AKH) and selected September 8, 2015 (when Judge Koeltl serves as Part I judge) as a hearing date. Because we do not believe that any judge has been assigned to this matter as of yet, we write to both Your Honors.

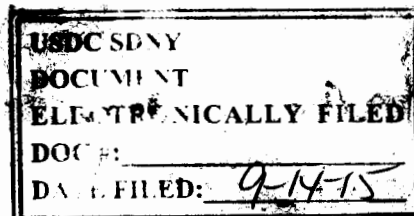
Applicant Mees, respondent Citi, and the defendant in the underlying action in the Netherlands are in the process of meeting and conferring regarding the application, which will likely result in Citi not opposing the application and initially producing, by September 11, 2015, documents to the defendant for a privilege and confidentiality review before producing those documents to us. We anticipate the need for the Court's assistance only in the event a conflict arises regarding the defendant's privilege withholdings or confidentiality designations. Furthermore, depending on the efforts that Citi is presently undertaking to provide certain information through other means, our request to take Citi's deposition may be obviated, and we would need the Court's intervention only if we are unable to resolve the deposition issue. (We accept that Citi has not waived its right to object to our deposition request). Accordingly, we respectfully request an adjournment of the September 8 hearing *sine die*. We anticipate filing a stipulation to effect the parties' agreement in the coming days.

Respectfully,

Olav A. Haazen

cc (via email):

J. Michael Riordan, *counsel for Citigroup*
Adrienne B. Koch, *counsel for defendant*



The case before me is adjourned to Oct. 9, 2015, 10:00 a.m. If Judge Koeltl consents, I shall hear the matter before him as well. 9-11-15